REMARKS

Claims 1, 2, 5-21 and 24-38 are pending. Claims 1, 2, 5-14, 16-21 and 24-38 stand rejected. Claim 15 stand objected to.

Claims 1, 20, 31, and 35 have been amended. No claims have been canceled. No claims have been added. Support for the amendments is found in the specification, the drawings, and in the claims as originally filed. Applicants submit that the amendments do not add new matter.

Double Patenting

Claims 1, 2, 5-21 and 24-38 have been rejected under the judicially created doctrine of obviousness-type double patenting as being unpatentable over claims 1-24 of U.S. Patent No. 6,208,971 in view of U.S. Patent No. 5,860,063 to Gorin, et al., ("Gorin").

Applicant submits herewith a terminal disclaimer to overcome the double patenting rejection.

Therefore Applicant respectfully submits that the Examiner's double patenting rejection has been overcome.

Rejections under 35 U.S.C. § 103

Claims 1-2, 5-6, 12, 20, 21, 24, 31-32 and 35-36 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Gorin in view of U.S. Patent No. 5,122,951 to Kamiya ("Kamiya").

Applicant has amended claim 1 to particularly point out that processing the sequence of words using word agglomeration replaces a sequence of words with a

sequence of word n-tuples ("*n*-tuple sequence"). The *n*-tuple sequence comprises word n-tuples. The word n-tuples are all strings of *n* consecutive words in the sequence of words being processed. The *n*-tuple sequence is represented by a vector representation in a semantic space.

Gorin teaches clustering of meaninigful phrases. More specifically, Gorin discloses selecting phrases that are meaningful for the task (col. 7, lines 1-9). In particular, Gorin discloses that the selected meaningful phrases that have similar strings and semantics are clustered together (col. 7, lines 36- col.8, lines 4).

The Examiner stated that "Gorin does not specifically suggest that agglomerative clustering involves replacing a sequence of words with an associated *n*-tuple sequence, wherein the *n*-tuple sequence comprises a vector representation in semantic space all strings of n consecutive words in the sequence of words..." (Office Action, p. 5, 01/24/06).

Kamiya teaches converting a word sequence into a sequence of concept numbers that are indicative the concepts of the words (col. 7, lines 14-58). Further, Kamiya discloses obtaining the frequency of occurrences of the concept numbers of the words in the histogram (col. 7, line 59- col. 8, line 44). In particular, Kamiya discloses clustering the frequency of occurrences of the concept numbers of the words (col. 8, lines 44-60), in contrast to processing the sequence of words using word agglomeration that replaces the sequence of words with a sequence of word n-tuples that are all strings of *n* consecutive words in the sequence of words, as recited in amended claim 1.

It is respectfully submitted that Gorin does not teach or suggest a combination with Kamiya, and Kamiya does not teach or suggest a combination with Gorin. Gorin teaches clustering of the meaningful phrases. Kamiya, in contrast, teaches clustering of

the frequency of occurrences of the concept numbers. It would be impermissible hindsight, based on Applicants own disclosure, to combine Gorin and Kamiya.

Furthermore, even if Gorin and Kamiya were combined, such a combination would lack the following limitations of amended claim 1: processing the sequence of words using word agglomeration that replaces the sequence of words with an associated n-tuple sequence, the n-tuple sequence comprising word n-tuples that are all strings of n consecutive words in the sequence of words, wherein the n-tuple sequence is represented by a vector representation in a semantic space.

Therefore, Applicant respectfully submit that amended claim 1 is not obvious under 35 U.S.C. § 103(a) over Gorin in view of Kamiya.

Because amended claims 20, 31, and 35 contain the discussed limitations, Applicant respectfully submits that amended claims 20, 31, and 35 are not obvious under 35 U.S.C. § 103(a) over Gorin in view of Kamiya.

Given that claims 2, 5-6, 12, 21, 24, 32, and 36 depend from amended claims 1, 20, 31, and 35 respectively, and add additional limitations, Applicant respectfully submits that claims 2, 5-6, 12, 21, 24, 32, and 36 are not obvious under 35 U.S.C. § 103(a) over Gorin in view of Kamiya.

Claims 7-11, 13-14, 16-19, 25-30, 33-34, and 37-38 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Gorin in view of Kamiya and further in view of U.S. Patent No. 6,317,707 to Bangalore, et al. ("Bangalore").

It is respectfully submitted that Gorin does not teach or suggest a combination with Kamiya and Bangalore, Kamiya does not teach or suggest a combination with Gorin and Bangalore, and Bangalore does not teach or suggest a combination with Gorin and Kamiya. Gorin teaches clustering the meaningful phrases. Kamiya, in contrast, teaches

clustering the frequency of occurrences of the concept numbers. Bangalore, in contrast, teaches clustering the words according to their lexical significance (col. 1, line 59 –col. 2, line 6). It would be impermissible hindsight, based on Applicants own disclosure, to combine Gorin, Kamiya, and Bangalore.

Furthermore, even if Gorin, Kamiya, and Bangalore were combined, such a combination would lack processing the sequence of words using word agglomeration that replaces the sequence of words with an associated n-tuple sequence, the n-tuple sequence comprising word n-tuples that are all strings of n consecutive words in the sequence of words, wherein the n-tuple sequence is represented by a vector representation in a semantic space, as recited in amended claim 1.

Therefore, Applicant respectfully submit that amended claim 1 is not obvious under 35 U.S.C. § 103(a) over Gorin in view of Kamiya, and further in view of Bangalore.

Because amended claims 20, 31, and 35 contain the discussed limitations, Applicant respectfully submits that amended claims 20, 31, and 35 are not obvious under 35 U.S.C. § 103(a) over Gorin in view of Kamiya, and further in view of Bangalore.

Given that claims 7-11, 13-14, 16-19, 25-30, 33-34, and 37-38 depend from amended claims 1, 20, 31, and 35 respectively, and add additional limitations, Applicant respectfully submits that claims 7-11, 13-14, 16-19, 25-30, 33-34, and 37-38 are not obvious under 35 U.S.C. § 103(a) over Gorin in view of Kamiya, and further in view of Bangalore.

Allowable Subject Matter

Applicant thanks the Examiner for indicating that dependent claim 15 contains allowable subject matter if rewritten in independent form including all of the limitations of the base claim and any intervening claims.

At this time, however, Applicant respectfully declines the invitation to rewrite claim 15 as an independent claim because Applicant believes all the pending claims as amended are allowable over the art of record.

Conclusion

It is respectfully submitted that in view of the amendments and arguments set forth herein, the applicable rejections and objections have been overcome. If there are any additional charges, please charge Deposit Account No. 02-2666 for any fee deficiency that may be due.

Respectfully submitted,

BLAKELY SOKOLOFF TAYLOR ZAFMAN LLP

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James C. Scheller
Reg. No.: 31,195

12400 Wilshire Boulevard
Seventh Floor
Los Angeles, California 90025
(408) 720-8300